

ADRMOP,CONSENT,RELATE

**U.S. District Court
California Northern District (San Francisco)
CIVIL DOCKET FOR CASE #: 3:18-cv-04105-LB**

American Civil Liberties Union of Northern California v. U.S.
Department of Homeland Security, Immigration and Customs
Enforcement

Assigned to: Magistrate Judge Laurel Beeler
Relate Case Case: 3:19-cv-02757-LB
Cause: 05:552 Freedom of Information Act

Date Filed: 07/10/2018
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

**American Civil Liberties Union of
Northern California**

represented by **Andrea L. Scripa**
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
617-570-1000
Email: AScripa@goodwinlaw.com
ATTORNEY TO BE NOTICED

Andrew Shichen Ong
Goodwin Procter LLP
601 Marshall Street
Redwood City, CA 94063
650-752-3100
Email: aong@goodwinlaw.com
ATTORNEY TO BE NOTICED

Hayes Phillips Hyde
Goodwin Procter LLP
Three Embarcadero Center
San Francisco, CA 94111
415-733-6000
Fax: 415-677-9041
Email: hhyde@goodwinlaw.com
ATTORNEY TO BE NOTICED

Hong-An Vu
Goodwin Procter LLP
601 S. Figueroa St
41St Floor
Los Angeles, CA 90017
213.426.2500
Fax: 213.623.1673
Email: hvu@goodwinlaw.com
ATTORNEY TO BE NOTICED

Ian Chen
Goodwin Procter LLP
601 Marshall Street
Redwood City, CA 94063
650-752-3100
Email: IanChen@goodwinlaw.com
ATTORNEY TO BE NOTICED

Jamie Lorraine Crook
ACLU of Northern California
ACLU of Northern California
39 Drumm Street
San Francisco
San Francisco, CA 94111
United Sta

4156212493
Email: jcrook@aclunc.org
ATTORNEY TO BE NOTICED

Julia Harumi Mass
American Civil Liberties Union of
Northern California, Inc.
39 Drumm Street
San Francisco, CA 94111
415-621-2493
Fax: 415-255-8437
Email: jmass@aclunc.org
ATTORNEY TO BE NOTICED

Vasudha Talla
ACLU Foundation of Northern California,
Inc.
39 Drumm Street
San Francisco, CA 94111
(415) 621-2493
Fax: (415) 255-8437
Email: vtalla@aclunc.org
ATTORNEY TO BE NOTICED

Indra Neel Chatterjee
Goodwin Procter LLP
601 Marshall Street
Redwood City, CA 94063
(650) 752-3100
Fax: (650) 853-1038
Email: NChatterjee@goodwinlaw.com
ATTORNEY TO BE NOTICED

V.

Defendant

**U.S. Department of Homeland
Security, Immigration and Customs
Enforcement**

represented by **Kenneth Warren Brakebill**
U.S. Attorney's Office
450 Golden Gate Avenue
Box 36055
San Francisco, CA 95102
415-436-7167
Email: kenneth.brakebill@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Gioconda R. Molinari
U.S. Attorney's Office, Civil Division
450 Golden Gate Avenue, 9th Floor
Box 36055
San Francisco, CA 94102-3495
(415) 436-7220
Fax: (415) 436-6748
TERMINATED: 09/10/2019

3rd party plaintiff

Florice Liborio Ramos

represented by **Andrew Shichen Ong**
(See above for address)
ATTORNEY TO BE NOTICED

3rd party plaintiff

Maria de Jesus Medina Ramirez

represented by

Andrew Shichen Ong
 (See above for address)
ATTORNEY TO BE NOTICED

3rd party plaintiff**Maria Valdovinos Diaz**

represented by **Andrew Shichen Ong**
 (See above for address)
ATTORNEY TO BE NOTICED

3rd party plaintiff**Yolanda Vallejo Medrano**

represented by **Andrew Shichen Ong**
 (See above for address)
ATTORNEY TO BE NOTICED

V.

3rd party defendant**G4S Secure Solutions (USA), Inc.**

represented by **A. Louis Dorny**
 Gordon and Rees LLP
 633 West Fifth Street, 52nd Floor
 Los Angeles, CA 90071
 (213) 576-5000
 Fax: (213) 576-5024
 Email: ldorny@gordonrees.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
07/10/2018	<u>1</u>	COMPLAINT for Declaratory and Injunctive Relief Under the Freedom of Information Act against U.S. Department of Homeland Security, Immigration and Customs Enforcement (Filing fee \$ 400, receipt number 0971-12497861.). Filed by American Civil Liberties Union of Northern California. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4, # <u>5</u> Civil Cover Sheet)(Chatterjee, Indra) (Filed on 7/10/2018) Modified on 7/10/2018 (fabS, COURT STAFF). (Entered: 07/10/2018)
07/10/2018	<u>2</u>	Proposed Summons. (Chatterjee, Indra) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>3</u>	NOTICE of Appearance by Andrew Shichen Ong (Ong, Andrew) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>4</u>	NOTICE of Appearance by Hayes Phillips Hyde (Hyde, Hayes) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>5</u>	NOTICE of Appearance by Hong-An Vu (Vu, Hong-An) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>6</u>	NOTICE of Appearance by Ian Chen (Chen, Ian) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>7</u>	Case assigned to Magistrate Judge Laurel Beeler. Counsel for plaintiff or the removing party is responsible for serving the Complaint or Notice of Removal, Summons and the assigned judge's standing orders and all other new case documents upon the opposing parties. For information, visit <i>E-Filing A New Civil Case</i> at http://cand.uscourts.gov/ecf/caseopening . Standing orders can be downloaded from the court's web page at www.cand.uscourts.gov/judges . Upon receipt, the summons will be issued and returned electronically. Counsel is required to send chambers a copy of the initiating documents pursuant to L.R. 5-1(e)(7). A scheduling order will be sent by Notice of Electronic Filing (NEF) within two business days. Consent/Declination due by

		7/24/2018. (srnS, COURT STAFF) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>8</u>	Initial Case Management Scheduling Order with ADR Deadlines: Case Management Statement due by 10/4/2018. Initial Case Management Conference set for 10/11/2018 11:00 AM in San Francisco, Courtroom C, 15th Floor. (fabS, COURT STAFF) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>9</u>	Summons Issued as to U.S. Department of Homeland Security, Immigration and Customs Enforcement, U.S. Attorney and U.S. Attorney General (fabS, COURT STAFF) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>10</u>	NOTICE of Appearance by Vasudha Talla (Talla, Vasudha) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/10/2018	<u>11</u>	NOTICE of Appearance by Julia Harumi Mass (Mass, Julia) (Filed on 7/10/2018) (Entered: 07/10/2018)
07/11/2018	<u>12</u>	MOTION for leave to appear in Pro Hac Vice (Filing fee \$ 310, receipt number 0971-12502511.) filed by American Civil Liberties Union of Northern California. (Els, Andrea) (Filed on 7/11/2018) (Entered: 07/11/2018)
07/11/2018	<u>13</u>	Order by Magistrate Judge Laurel Beeler granting <u>12</u> Motion for Pro Hac Vice. Attorney Andrea S. Els representing Plaintiffs. (ejkS, COURT STAFF) (Filed on 7/11/2018) (Entered: 07/12/2018)
07/16/2018	<u>14</u>	CERTIFICATE OF SERVICE by American Civil Liberties Union of Northern California re <u>3</u> Notice of Appearance, <u>1</u> Complaint, <u>2</u> Summons Issued as to USA, <u>6</u> Notice of Appearance, <u>4</u> Notice of Appearance, <u>5</u> Notice of Appearance (Chatterjee, Indra) (Filed on 7/16/2018) (Entered: 07/16/2018)
07/17/2018	<u>15</u>	NOTICE of Appearance by Gioconda R. Molinari (Molinari, Gioconda) (Filed on 7/17/2018) (Entered: 07/17/2018)
07/20/2018	<u>16</u>	CONSENT/DECLINATION to Proceed Before a US Magistrate Judge by U.S. Department of Homeland Security, Immigration and Customs Enforcement.. (Molinari, Gioconda) (Filed on 7/20/2018) (Entered: 07/20/2018)
07/20/2018	<u>17</u>	CONSENT/DECLINATION to Proceed Before a US Magistrate Judge by American Civil Liberties Union of Northern California.. (Chatterjee, Indra) (Filed on 7/20/2018) (Entered: 07/20/2018)
07/26/2018	<u>18</u>	STIPULATION to Respond to Complaint filed by U.S. Department of Homeland Security, Immigration and Customs Enforcement. (Molinari, Gioconda) (Filed on 7/26/2018) (Entered: 07/26/2018)
09/06/2018	<u>19</u>	ANSWER to Complaint by U.S. Department of Homeland Security, Immigration and Customs Enforcement. (Molinari, Gioconda) (Filed on 9/6/2018) (Entered: 09/06/2018)
09/21/2018	<u>20</u>	ADR Certification (ADR L.R. 3-5 b) of discussion of ADR options (Molinari, Gioconda) (Filed on 9/21/2018) (Entered: 09/21/2018)
09/21/2018	<u>21</u>	ADR Certification (ADR L.R. 3-5 b) of discussion of ADR options (By Parties And Counsel) (Chatterjee, Indra) (Filed on 9/21/2018) (Entered: 09/21/2018)
09/26/2018	<u>22</u>	Certificate of Interested Entities by American Civil Liberties Union of Northern California (Ong, Andrew) (Filed on 9/26/2018) (Entered: 09/26/2018)
09/29/2018		Set/Reset Hearing Initial Case Management Conference set for 11/1/2018 11:00 AM in San Francisco, Courtroom B, 15th Floor. The court has a scheduling conflict with the initial CMC on 10/11/2018 and resets it to 11/1/2018 at 11:00 a.m. (Beeler, Laurel) (Filed on 9/29/2018) (Entered: 09/29/2018)
10/25/2018	<u>23</u>	NOTICE of Appearance by Jamie Lorraine Crook (Crook, Jamie) (Filed on 10/25/2018) (Entered: 10/25/2018)

10/25/2018	<u>24</u>	CASE MANAGEMENT STATEMENT (<i>Joint</i>) filed by American Civil Liberties Union of Northern California. (Ong, Andrew) (Filed on 10/25/2018) (Entered: 10/25/2018)
11/01/2018	<u>25</u>	<p>Minute Entry for proceedings held before Magistrate Judge Laurel Beeler: Initial Case Management Conference held on 11/1/2018. Parties are to confer within two weeks and to include agency counsel in the conference to identify an approach to document production.</p> <p>Further Case Management Conference set for 1/17/2019 at 11:00 AM in San Francisco, Courtroom B, 15th Floor. Case Management Statement due by 1/10/2019.</p> <p>Total Time in Court: 22 minutes. Not Reported.</p> <p>Plaintiff's Attorneys: Vasudha Talla and Indra Chatterjee. Defendant's Attorney: Gioconda Molinari.</p> <p><i>(This is a text-only entry generated by the court. There is no document associated with this entry.)</i> (ejkS, COURT STAFF) (Date Filed: 11/1/2018) (Entered: 11/02/2018)</p>
01/02/2019	<u>26</u>	STIPULATION WITH PROPOSED ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE AND DEADLINE FOR CASE MANAGEMENT STATEMENT filed by U.S. Department of Homeland Security, Immigration and Customs Enforcement. (Molinari, Gioconda) (Filed on 1/2/2019) (Entered: 01/02/2019)
01/03/2019	<u>27</u>	<p>Order by Magistrate Judge Laurel Beeler granting in part <u>26</u> Stipulation To Continue Case Management Conference and Deadline for Case Management Statement.</p> <p>Further Case Management Conference previously set for 1/17/2019 is reset to 2/14/2019 at 11:00 AM in San Francisco, Courtroom B, 15th Floor. Case Management Statement due by 2/7/2019. (ejkS, COURT STAFF) (Filed on 1/3/2019) (Entered: 01/03/2019)</p>
02/06/2019	<u>28</u>	CLERK'S NOTICE RESETTING CASE MANAGEMENT CONFERENCE TIME: The court advances the start time of the CMC set for 2/14/2019 from 11:00 to 9:30 AM in San Francisco, Courtroom B, 15th Floor. <i>(This is a text-only entry generated by the court. There is no document associated with this entry.)</i> (ejkS, COURT STAFF) (Filed on 2/6/2019) (Entered: 02/06/2019)
02/07/2019	<u>29</u>	CASE MANAGEMENT STATEMENT (<i>Joint</i>) filed by American Civil Liberties Union of Northern California. (Attachments: # <u>1</u> Attachment A)(Ong, Andrew) (Filed on 2/7/2019) (Entered: 02/07/2019)
02/14/2019	<u>30</u>	<p>Minute Entry for proceedings held before Magistrate Judge Laurel Beeler: Further Case Management Conference held on 2/14/2019. The court asks agency counsel to file some representation in the form of a letter of the agency burden by 2/28/2019.</p> <p>Further Case Management Conference Call set for 3/8/2019 at 10:00 AM in San Francisco, Courtroom B, 15th Floor. The court will circulate a call-in number separately.</p> <p>Total Time in Court: 9 minutes. Not Reported.</p> <p>Plaintiff's Attorneys: Andrew Ong, Vasudha Talla and Jamie Crook. Defendant's Attorney: Gioconda Molinari.</p> <p><i>(This is a text-only entry generated by the court. There is no document associated with this entry.)</i> (ejkS, COURT STAFF) (Date Filed: 2/14/2019) (Entered: 02/15/2019)</p>
02/28/2019	<u>31</u>	RESPONSE re <u>29</u> Case Management Statement, 30 Case Management Conference – Further,,, Set Deadlines/Hearings,, <i>Defendant's Declaration Regarding Burden</i> by U.S. Department of Homeland Security, Immigration and Customs Enforcement. (Attachments: # <u>1</u> Declaration of ICE Deputy FOIA Officer Toni Fuentes)(Molinari,

		Gioconda) (Filed on 2/28/2019) (Entered: 02/28/2019)
03/01/2019	<u>32</u>	CASE MANAGEMENT STATEMENT (<i>Joint</i>) filed by American Civil Liberties Union of Northern California. (Attachments: # <u>1</u> Plaintiff's Attachment A)(Ong, Andrew) (Filed on 3/1/2019) (Entered: 03/01/2019)
03/07/2019	<u>33</u>	CLERK'S NOTICE RESETTING CASE MANAGEMENT CONFERENCE CALL: Further Case Management Conference set for 3/8/2019 at 10:00 AM is reset to 11:00 AM . The call-in information remains the same. (<i>This is a text-only entry generated by the court. There is no document associated with this entry.</i>) (ejkS, COURT STAFF) (Filed on 3/7/2019) (Entered: 03/07/2019)
03/08/2019	<u>34</u>	<p>Minute Entry for proceedings held before Magistrate Judge Laurel Beeler: Further Case Management Conference held on 3/8/2019. The court held a case-management conference. The plaintiffs will give the defendants a narrowed version of their FOIA request (as specific as possible) within a week. The government will confer with the client and within a week of receipt, will update the plaintiffs about any proposed narrowing and the time period for collection of the records. After the time period for collection of the records has lapsed, the government will update the plaintiffs about the volume of records collected and propose a time period for producing that information. If the request is sufficiently narrow, this may allow production to the plaintiffs by May. Thereafter, the parties will confer about a timeline for further narrowed requests or the production of a Vaughn index (and will discuss whether the agency might produce a rolling Vaughn index based on the plaintiffs' prioritization of certain productions). As a calendaring device, the court sets a further case-management conference for June 20, 2019 at 11:00 a.m. and directs the parties to file an updated case-management statement by June 13, 2019. The parties may adjust this case-management conference by stipulation (and may request an earlier conference if it would be helpful). (Not Reported).</p> <p>Further Case Management Conference set for 6/20/2019 at 11:00 AM in San Francisco, Courtroom B, 15th Floor. Case Management Statement due by 6/13/2019.</p> <p>Plaintiff's Attorneys: Vasudha Talla, Jaime Crook (Phone) and Andrew Ong (Phone). Defendant's Attorney: Gioconda Molinari. Also appearing by phone: Kristin Brudy-Everett and Kishore Khan. (<i>This is a text-only entry generated by the court. There is no document associated with this entry.</i>) (ejkS, COURT STAFF) (Date Filed: 3/8/2019) (Entered: 03/08/2019)</p>
06/13/2019	<u>35</u>	JOINT CASE MANAGEMENT STATEMENT filed by American Civil Liberties Union of Northern California. (Attachments: # <u>1</u> Plaintiff's Attachment A)(Ong, Andrew) (Filed on 6/13/2019) (Entered: 06/13/2019)
06/20/2019	<u>36</u>	<p>Minute Entry for proceedings held before Magistrate Judge Laurel Beeler: Further Case Management Conference held on 6/20/2019. Further Case Management Conference set for 9/26/2019 at 11:00 AM in San Francisco, Courtroom B, 15th Floor. Case Management Statement due by 9/19/2019.</p> <p>Total Time in Court: 13 minutes. Not Reported.</p> <p>Plaintiff's Attorneys: Andrew Ong and Jaime Crook. Defendant's Attorney: Gioconda Molinari. (<i>This is a text-only entry generated by the court. There is no document associated with this entry.</i>) (ejkS, COURT STAFF) (Date Filed: 6/20/2019) (Entered: 06/25/2019)</p>
06/26/2019	<u>37</u>	NOTICE by G4S Secure Solutions (USA), Inc. <i>Notice of Related Case Pursuant to Civil L.R. 3-12 to be filed in Case No 3:18-cv-04105; Administrative Motion to Consider Whether Cases Should be Related Pursuant to Civil L.R. 7-11</i> (Dorny, A.) (Filed on 6/26/2019) (Entered: 06/26/2019)
06/28/2019	<u>38</u>	RESPONSE re <u>37</u> Notice (Other), (<i>Plaintiffs' Response to Notice of Related Case and Administrative Motion to Consider Whether Cases Should Be Related</i>) by Floricel

		Liborio Ramos, Maria de Jesus Medina Ramirez, Maria Valdovinos Diaz, Yolanda Vallejo Medrano. (Ong, Andrew) (Filed on 6/28/2019) (Entered: 06/28/2019)
06/28/2019	<u>39</u>	RESPONSE re <u>37</u> Notice (Other), (<i>Plaintiff's Response to Notice of Related Case and Administrative Motion to Consider Whether Cases Should Be Related</i>) by American Civil Liberties Union of Northern California. (Ong, Andrew) (Filed on 6/28/2019) (Entered: 06/28/2019)
06/28/2019	<u>40</u>	RESPONSE re <u>37</u> Notice (Other), FEDERAL DEFENDANT'S OPPOSITION TO ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES 18-4105-LB and 19-2757-JD SHOULD BE RELATED by U.S. Department of Homeland Security, Immigration and Customs Enforcement. (Molinari, Gioconda) (Filed on 6/28/2019) (Entered: 06/28/2019)
07/05/2019	<u>41</u>	REPLY IN SUPPORT OF MOTION FOR RELATED CASE by G4S Secure Solutions (USA), Inc. (Dorny, A.) (Filed on 7/5/2019) Modified on 7/8/2019 (fabS, COURT STAFF). (Entered: 07/05/2019)
07/08/2019	<u>42</u>	ORDER RELATING CASE. The Court finds that the cases are related: C18-4105 LB and C19-2757 JD. Signed by Judge Laurel Beeler on 07/08/2019. (ejkS, COURT STAFF) (Filed on 7/8/2019) (Entered: 07/08/2019)
09/10/2019	<u>43</u>	NOTICE of Substitution of Counsel by Kenneth Warren Brakebill (Brakebill, Kenneth) (Filed on 9/10/2019) (Entered: 09/10/2019)
09/19/2019	<u>44</u>	CASE MANAGEMENT STATEMENT (<i>Joint</i>) filed by American Civil Liberties Union of Northern California. (Ong, Andrew) (Filed on 9/19/2019) (Entered: 09/19/2019)
09/23/2019	<u>45</u>	CLERK'S NOTICE RESETTING CASE MANAGEMENT CONFERENCE TIME: Further Case Management Conference set for 9/26/2019 at 11:00 AM is reset to 9:30 AM in San Francisco, Courtroom B, 15th Floor. (<i>This is a text-only entry generated by the court. There is no document associated with this entry.</i>) (ejkS, COURT STAFF) (Filed on 9/23/2019) (Entered: 09/23/2019)
09/23/2019	<u>46</u>	NOTICE of Change In Counsel by Vasudha Talla (Talla, Vasudha) (Filed on 9/23/2019) (Entered: 09/23/2019)